EPA Reg. Jacket 85678-65

PROCESSING REQUEST

Reg # 85678-65 **Decision # 546545**

Description: ☒ **New Registration** ☐ **New Use**

☐ **Amendment** ☐ **Other**

Electronic Label & Letter (see PPLS):	OR	**Non Electronic Label & Letter** (Scanning required):
☒ Dated: 2019/Nov 18		☐ Dated:

Only one label type should be selected

Other Materials Sent (see jacket):

☒ New CSF(s) Dated: 11/27/2018 Basic

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Anna Briley

Division: Registration Division (RD) / IVB1

Phone: 703-347-0262 **Date:**

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (7505P)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

NOTICE OF PESTICIDE:
_X_ Registration
___ Reregistration
(under FIFRA, as amended)

EPA Reg. Number:	Date of Issuance:
85678-65	11/18/19

Term of Issuance:
Conditional

Name of Pesticide Product:
Bifenthrin Technical

Name and Address of Registrant (include ZIP Code):

Rachel L. Hardie
Agent for RedEagle International LLC
Wagner Regulatory Associates
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(C). You must comply with the following conditions:

1. Submit and/or cite all data required for registration/reregistration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.

Signature of Approving Official:

J. d Herrick

Jacquelyn Herrick, Product Manager 03
Invertebrate and Vertebrate Branch 1
Registration Division (7505P)

Date:
11/18/19

EPA Form 8570-6

2. You are required to comply with the data requirements described in the DCI

    a. Bifenthrin GDCI-128825

    You must comply with all of the data requirements within the established deadlines. If you have questions about the Generic DCI listed above, you may contact the Chemical Review Manager in the Pesticide Reevaluation Division: http://iaspub.epa.gov/apex/pesticides/f?p=chemicalsearch:1

3. Make the following label changes before you release the product for shipment:

    - Revise the EPA Registration Number to read, "EPA Reg. No. 85678-65."

4. Submit one copy of the final printed label for the record before you release the product for shipment.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSFs:

- Basic CSF dated 11/27/2018

If you have any questions, please contact Anna Briley by phone at (703) 347-0262, or via email at briley.anna-katrina@epa.gov.

Enclosure

BIFENTHRIN TECHNICAL

For Formulating Use Only

ACCEPTED
11/18/2019
Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 85678-65

Active Ingredient:

Bifenthrin *	98.28%
OTHER INGREDIENTS:	1.72%
Total	100.00%

* 2-methyl[1,1'-biphenyl]-3-yl)methyl 3-(2-chloro-3,3,3-trifluoro-1-propenyl) -2,2-dimethyl-cyclopropanecarboxylate; *Cis isomers 97% minimum, trans isomers 3% maximum.*

KEEP OUT OF REACH OF CHILDREN

WARNING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

FIRST AID	
IF SWALLOWED:	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF INHALED:	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for treatment advice
IF ON SKIN OR CLOTHING:	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
IF IN EYES:	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or physician, or going for treatment. You may also contact 1-800-222-1222 for emergency medical treatment information	

EPA Reg. No. 85678-XX
EPA Est. No._____
NET WEIGHT:_____LBS (_____KG)

Manufactured For
RedEagle International LLC
5143 S. Lakeland Dr., Suite 4
Lakeland, FL 33813

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING

May be fatal if swallowed. Harmful if inhaled or absorbed through skin. Causes moderate eye irritation. Avoid breathing vapor or spray mist. Avoid contact with skin, eyes or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco or using the toilet.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic invertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

PHYSICAL/CHEMICAL HAZARDS

Do not use or store near heat or open flame.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
Formulators using this product are responsible for obtaining EPA registration of their formulated products.

(1) Only for formulation into an insecticide/miticide for the following sites of use:

Artichokes (Globe)
Bananas (import only)
Beet, Garden (roots and tops)
Brassica, head and stem (subgroup 5A, except Cabbage)
Brassica, leafy greens (subgroup 5B)
Bushberries
Cabbage
Caneberry
Canola
Cilantro
Citrus Crop Group
Coriander
Corn (Field, Sweet, Popcorn) (Field, Sweet, Popcorn Grown for Seed) (Grain and Silage)
Cotton
Crambe
Cucurbit Vegetables Group
Fruiting Vegetables Crop Group
Grapes
Head and Stem Brassica Vegetables
Herbs (subgroup 19A)
Hops
Leafy Petioles Vegetables
Legume Vegetables
Legume Vegetables (Succulent Shelled and Dried Shelled)
Lettuce (head)
Mayhaw
Okra
Peanut
Pear
Radish (tops)
Rapeseed
Root and Tuber Vegetables Group (subgroup 1B) (except Sugar Beet and Garden Beet)
Soybean
Spinach
Strawberry
Tobacco
Tree Nut Group (Crop Group 14), Including Pistachios
Tuberous and Corm Vegetables (subgroup 1C)
Turnip Greens

Terrestrial Non-Food:

- Wood Treatment and Protection
- Christmas trees
- Conifer Seed Orchards
- Nonbearing Fruit and Nut Trees
- Greenhouse Grown Ornamental Trees, Shrubs, Plants, Flowers
- Outdoor Insect Control
- Residential Lawns
- Ornamental Plants, Trees, Shrubs, and Vines (Woody)
- Turfgrass (including golf courses), Sod Farms
- Grass Forage Fodder and Hay Group
- Grass Grown for Seed and Pasture and Rangeland

Food Handling Establishments:

- Places other than private residences in which food is held, processed, prepared, orserved.

(2) Uses for which U.S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and
(3) Uses for experimental purposes that are in compliance with U.S. EPA requirements.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.
PESTICIDE STORAGE: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Carefully open containers. After partial use, replace lids and close tightly. Do not contaminate other pesticides, fertilizers, water, food, or feed by storage or disposal.

To confine spill: If liquid, dike surrounding area or absorb with sand, cat litter, or commercial clay. If dry material, cover to prevent dispersal. Place damaged package in a holding container. Identify contents.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. Dispose of excess waste or pesticide by use according to label directions, or contact your State Pesticide or Environmental Control Agency, or Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Completely empty container into formulating equipment by shaking and tapping sides and bottom to loosen clinging particles. Triple rinse or pressure rinse container (or equivalent) promptly after emptying. Offer for recycling, if available, or reconditioning if appropriate. If recycling is not available, puncture and dispose of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke. If rinsate cannot be used, follow pesticide disposal instructions.

WARRANTY AND DISCLAIMER STATEMENT

NOTICE: Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of RedEagle International LLC. To the extent allowable under State law, all such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, REDEAGLE INTERNATIONAL LLC MAKES NO WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of RedEagle International LLC is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, REDEAGLE INTERNATIONAL LLC DISCLAIMS ANY LIABILITY WHATSOEVER FOR SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

LIMITATIONS OF LIABILITY: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT REDEAGLE INTERNATIONAL LLC'S ELECTION, THE REPLACEMENT OF PRODUCT.

From: Rachel Hardie
To: Briley, Anna-Katrina
Cc: Herrick, Jacquelyn
Subject: RE: 85678-AL Request to revise proposed product name
Date: Thursday, November 14, 2019 1:56:20 PM

Good Afternoon Anna,

RedEagle does not wish to change the product name. "Bifenthrin Technical" is consistent with how the company names their technicals and the regulation states that one company cannot have the same brand name for a different registration number under the same company. RedEagle does not have another Bifenthrin Technical listed under their company and therefore wish to keep "Bifenthrin Technical" as the brand name. Please let me know if you need anything else.

Regards,
Rachel

Rachel Hardie
Wagner Regulatory Associates, Inc.
7217 Lancaster Pike, Suite A
Hockessin, DE 19707
Rachel@Wagnerreg.com
302-635-7289

From: Briley, Anna-Katrina <briley.anna-katrina@epa.gov>
Sent: Thursday, November 14, 2019 10:50 AM
To: Rachel Hardie <Rachel@wagnerreg.com>
Cc: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>
Subject: 85678-AL Request to revise proposed product name

Good morning Rachel,

As we discussed yesterday, we recommend revising the proposed product name. There are products already in market with the same name "Bifenthrin Technical".

Please let us know if your client is amenable to this change. If so, please send updated admin documents and a revised label displaying the change.

Thank you for considering,

Anna

Anna Katrina Briley
Invertebrate and Vertebrate Branch 1
Registration Division
Office of Pesticide Programs

Office of Chemical Safety and Pollution Prevention
US Environmental Protection Agency
O: (703) 347-0262
briley.anna-katrina@epa.gov

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460
OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION
OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

DP BARCODE No.: D451991; **FILE SYMBOL/REG. No.**: 85678-AL; **PRODUCT NAME**: Bifenthrin Technical; **DECISION No.**: 546545; **PC Code(s)**: 128825; **ACTION CODE**: R334; **FOOD Use**: Yes

DOCUMENT CONTAINS CONFIDENTIAL BUSINESS INFORMATION

DATE: November 5, 2019

SUBJECT: Product Chemistry Review of "Bifenthrin Technical"

FROM: Dehui Duan, PhD
Product Chemistry Team 11-6-2019
Chemistry, Inerts & Toxicology Assessment Branch (CITAB)/RD (7505P) 11.6.19

TO: Anna Briley / Catherine Aubee, RM 03
IVB1 / RD (7505P)

REGISTRANT: REDEAGEL INTERNATIONAL LLC

MRID Number(s): 50668401 - 50668410

INTRODUCTION:

The registrant has submitted an application to register a new technical grade active ingredient Bifenthrin product and claimed that it is similar to EPA Reg. No. 91640-8. The registrant has submitted a basic CSF dated 11-27-2018 and Group A and Group B chemistry data with MRID Nos. 50668401 - 50668410.

The cited basic CSF dated unavailable – Nominal concentration: 98.7% – GenMerica NA, LLC (Reg. No. 91640-8 transferred to 5905-634) – Manufacture site: [redacted]

The proposed basic CSF dated 11/27/2018 – Nominal concentration: 98.28% – RedEagle International LLC (Reg. No. 85678-AL) – Manufacture site: [redacted]

CITAB has been asked to determine the acceptability of the product chemistry data, proposed basic CSF and similarity to the cited product.

SUMMARY OF FINDINGS:

1. Group A guidelines:

830.1550: (product identity & composition)

The active ingredient was adequately described (MRID 50668401). The nominal concentration of the active ingredient (98.28%) provided on the basic CSF (dated 11/27/2018) is the same as the average derived from the five-batch preliminary analysis results (98.28%, from Page 10 of 280 in the Confidential Attachment of MRID 50668402). It is within the certified limits given on the proposed basic CSF. The information presented meets the data requirements for 40 CFR 158.320.

Product ingredient source information may be entitled to confidential treatment

830.1600: (description of materials used to produce the product)

Safety Data Sheets (SDSs) of all the starting materials, and their specifications and suppliers were provided in the study (MRID 50668401). The information presented meets the data requirements for 40 CFR 158.325.

830.1620 (description of production process)

A detailed description of the production process, vessels and equipment, quality control measures and a flow chart were included in MRID 50668401. The information presented meets the data requirements for 40 CFR 158.330.

830.1670 (discussion on the formation of impurities)

Potential impurities were identified and quantified as part of the five-batch analysis (MRID 50668402). The formation, identities and toxicology of the impurities were fully discussed in MRID 50668401. Only one impurity is considered significant and found at >0.1% w/w. The concentration of one impurity with toxicological significance present in Bifenthrin Technical is below detection limit. The information presented meets the data requirements for 40 CFR 158.335.

830.1700 (preliminary analysis)

Results are presented for a five-batch analysis using HPLC-UV with external standard calibration for the active ingredient. The nominal concentrations of the active ingredient were: 98.14, 98.28, 98.41, 98.31 and 98.26% (average 98.28%), which are all within the certified limits listed on the proposed basic CSF (dated 11/27/2018). Impurities were determined by validated HPLC-UV or GC-MS with external standard calibration (MRID No. 50668402). The information presented meets the data requirements for 40 CFR 158.345.

830.1750 (certified limits)

The nominal concentration of the active ingredient is the same as the average derived from the 5-batch preliminary analysis results. The proposed upper and lower certified limits for the active ingredient on the proposed basic CSF (dated 11/27/2018) are within the range of the guideline OCSPP 830.1750 recommendation. The nominal concentrations of all impurities are the same as the average derived from the 5-batch preliminary analysis results. Their upper certified limits are within the range of the guideline OCSPP 830.1750 recommendation. The information presented meets the data requirements for 40 CFR 158.350.

830.1800 (enforcement analytical method)

The analytical methods for quantifying the active ingredient and impurities in Bifenthrin Technical were HPLC/UV-DAD or GC/MS, which were validated for linearity, selectivity, recovery, repeatability, precision, LOQ and LOD (MRID 50668402). The identification of the active ingredient was confirmed by MS, UV and NMR. Impurities were identified by MS, UV and GC/MS. The content of water was determined by Karl Fischer titration. The information presented meets the data requirements for 40 CFR 158.355.

2. Group B guidelines (physical-chemical properties):

Guideline No.	Study Title	Value or Qualitative Description	CITAB's Assessment of Data	MRID Nos.
830.6303	Physical State	White powder with characteristic odor	A	50668403
830.6314	Oxidation/reduction	W	Granted	50668410
830.6315	Flammability	W	Granted	50668410
830.6316	Explodability	W	Granted	50668410
830.7000	pH	6.44 (aqueous suspension) at 20 °C	A	50668406
830.7100	Viscosity	Solid. Not applicable.	A	50668410
830.7300	Density (units)	0.626 g/mL (tap density)	A	50668407
830.6317	Storage stability Or Accelerated storage stability	Product is stable in air for at least 2 years under normal conditions of temperature and storage.	A	50668405
830.6320	Corrosion characteristics or Accelerated corrosion characteristics	No showed changes of any kind, such as perforations or leaks in the commercial packaging in 14 days.	A	50668405

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver request, NA = Not applicable, I = In progress; U = Upgradeable; I = In progress

CONCLUSIONS:

The CITAB has reviewed the proposed basic CSF (dated 11/27/2018) and the supporting Group A and Group B data for Bifenthrin Technical and has concluded that:

1. The product chemistry Group A data submitted for guidelines 830.1550 (product identity and composition), 830.1600 (description of materials used to produce the product), 830.1620 (description of production process), 830.1670 (discussion of the formation of impurities), 830.1700 (preliminary analysis), 830.1750 (certified limits), and 830.1800 (enforcement analytical method) are acceptable.

2. There was only one impurity whose concentration is over 0.1%. It would not cause toxicological concern as it is a stereoisomer of the active ingredient.

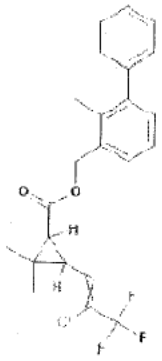
3. The product chemistry Group B data are acceptable.

4. The proposed product was found not to be substantially similar to the cited product with Reg. No. 91640-8 because the two products were processed differently and contained different impurities.

5. The proposed basic CSF (dated 11/27/2018) is acceptable.

Active Ingredient

Bifenthrin

Common Name:	Bifenthrin
Chemical Name (IUPAC):	(2-methyl-3-phenylphenyl)methyl 3-(2-chloro-3.3.3-trifluoroprop-1-enyl)-2.2-dimethylcyclopropane-1-carboxylate
CAS Number:	82657-04-3
Declared Concentration:	98.28% (nominal)
Molecular Formula:	$C_{23}H_{22}ClF_3O_2$
Molecular Structure:	
Molecular Weight:	422.872 g/mol

Confidential Appendix

[redacted]

Pages 17-18 Manufacturing process information may be entitled to confidential treatment

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND
POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION (7505P)

01/OCT/2019

MEMORANDUM

Subject:	Name of Pesticide Product:	Bifenthrin Technical
	EPA Reg. No. /File Symbol:	85678-AL
	DP Barcode:	D452039
	Decision No:	546545
	Action Code:	R334
	PC Code:	128825 (bifenthrin)
From:	Eugenia McAndrew, Biologist Chemistry, Inerts and Toxicology Assessment Branch Registration Division (7505P)	
To:	Anna Briley, Risk Management Team 03 IVB 1 Registration Division (7505P)	
Applicant:	RedEagle International LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707	

FORMULATION FROM LABEL:

Active Ingredient(s):	% by wt.
Bifenthrin	98.28
Other Ingredients:	1.72
Total:	100.00%

ACTION REQUESTED: Similarity determination for 85678-AL, proposed product, and 5905-634 (transferred from 91640-8), cited product.

BACKGROUND: RedEagle International LLC has applied for registration of Bifenthrin Technical, EPA File Symbol 85678-AL, claiming to be substantially similar to Bifenthrin Technical, EPA Reg. No. 5905-634 (transferred from 91640-8). Both products are technical grade for manufacturing use only. The submission includes a basic CSF dated November 27, 2018, label, data matrix and company letter.

The registrant is using the selective method of data support to satisfy the acute toxicity data requirements. The data matrix cites acute toxicity studies with MRIDs 001325-19, -20, -21, -22, -23 and 46008101. A search of the OPP electronic databases shows that five of these these studies were reviewed by the Health Effects Division in a 1984 memo (Zendzian; TXR 0003585; 06/JAN/1984). The acute inhalation study (MRID 46008101) was reviewed by the Technical Review Branch/Registration Division in a 2003 memo (Backus; D291768; EPA Reg. 279-3055; 14/OCT/2003).

RECOMMENDATIONS:

1. We compared the basic CSFs and labels for the proposed product, 85678-AL, and the cited product, 5905-634, and determined that the two products are substantially similar.

2. The acute toxicity profile for the proposed product, Bifenthrin Technical, EPA File Symbol 85678-AL, based on the cited data, is as follows:

acute oral toxicity	II	cited	MRID 00132519
acute dermal toxicity	III	cited	MRID 00132520
acute inhalation toxicity	III	cited	MRID 46008101
primary eye irritation	IV*	cited	MRID 00132522
primary skin irritation	IV	cited	MRID 00132521
dermal sensitization	negative**	cited	MRID 00132523

*This study was placed in Toxicity Category IV for primary eye irritation in the review referenced above. However, the cited product label indicates that it is in Toxicity Category III for eye irritation. Therefore, we recommend that the proposed product use precautionary and first aid statements for eye irritation.

**This study was classified as negative for dermal sensitization in the review referenced above. The labels for the cited and proposed products have the statement for dermal sensitization "Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals." Some studies have shown bifenthrin technical to be positive for dermal sensitization. We recommend that the proposed product label use this statement.

3. The proposed basic CSF submitted for 85678-AL must be reviewed and accepted by the product chemists in the Chemistry, Inerts and Toxicology Assessment Branch.

LABELING: Based on the toxicity profile, the following are the precautionary and first aid statements for this product:

Product ID #: 85678-00042

Product Name: Bifenthrin Technical

PRECAUTIONARY STATEMENTS

Signal Word: WARNING

Spanish Signal Word: AVISO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

Hazards to Humans and Domestic Animals:

May be fatal if swallowed. Harmful if absorbed through skin. Harmful if inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing vapor or spray mist. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

First Aid:

If swallowed:
-Call a poison control center or doctor immediately for treatment advice.
-Have person sip a glass of water if able to swallow.
-Do not induce vomiting unless told to do so by a poison control center or doctor.
-Do not give anything by mouth to an unconscious person.

If on skin or clothing:
-Take off contaminated clothing.
-Rinse skin immediately with plenty of water for 15-20 minutes.
-Call a poison control center or doctor for treatment advice.

If inhaled:
-Move person to fresh air.
-If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.
-Call a poison control center or doctor for treatment advice.

If in eyes:
-Hold eye open and rinse slowly and gently for 15-20 minutes.
-Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
-Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

Completion of 21-Day Content Screen

PM- 03

EPA Reg. #(File Symbol) 85678-AL

Decision # D_____

Data package delivered to you on 12/6/18 .
(date)

Jacket/Mini-jacket will be transferred to you today.
(Pick up from Document Center)

Thank you,

Registration Division's 21-Day Content Team

85678-AL

Memorandum

E-SUBMISSION

Date: 12 / 3 / 18

To: PM 3, Regulatory Manager

From: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted to OPPIN.

We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.

This is a: ☒ fully accepted submission
☐ partially accepted submission
☐ rejected submission

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

December 03, 2018

WAGNER REGULATORY ASSOCIATES, INC.
REDEAGLE INTERNATIONAL LLC
7217 Lancaster Pike, Suite A
PO.BOX : 640
HOCKESSIN, DE 19707

Report of Analysis for Compliance with PR Notice 11-03

Thank you for your submittal of 27-NOV-18. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 11-03. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

DATA TRANSMITTAL DOCUMENT

1. **Name and Address of Submitter**
RedEagle International LLC (EPA Company Number 85678)
c/o Wagner Regulatory Associates
PO Box 640
Hockessin, DE 19707

2. **Regulatory Action In Support Of Which This Package Is Submitted**
Application for Registration PRIA R334
Bifenthrin Technical

3. **Transmittal Date**
November 27, 2018

4. **List of Submitted Studies**

50668401	Bifenthrin Technical Product Identity and Composition, Description of Materials, Description of Production Process, Discussion of Formation and Toxicity of Impurities and Certified Limits; OPPTS 830.1550; 830.1600; 830.1620, 830.1670, 830.1750
50668402	Preliminary Analysis, Enforcement Analytical Method & Qualitative and Quantitative Profile of the test substance Bifenthrin TC (Five Batch Analysis); Report No. 14897.030.016.14; OPPTS 830.1700, 830.1800
50668403	Physical State, Appearance, Color, and Odor of BIFENTHRIN TC; Report No. 14897.001.064.15; OPPTS 830.6302, 830.6303, 830.6304
50668404	Stability to Normal and Elevated Temperatures, Metal and Metal Ions of BIFENTHRIN TC; Report No. 14897.481.004.15; OPPTS 830.6313
50668405	Physical and Chemical Characteristics Accelerated Storage Stability and Corrosion Characteristics of Bifenthrin TC; Report No. 14897.020.068.15; OPPTS 830.6318, 830.6320
50668406	Determination of the pH value of an aqueous solution of BIFENTHRIN TC; Report No. 14897.009.070.15; OPPTS 830.7000
50668407	Determination of the bulk density of BIFENTHRIN TC; Report No. 14897.015.070.15; OPPTS 830.7300
50668408	UV-VIS Absorption Spectra of BIFENTHRIN TC; Report No. 14897.037.004.15; OPPTS 830.7050
50668409	Dissociation Constant in Water of BIFENTHRIN TC; Report No. JT-0034/15; OPPTS 830.7370
50668410	BIFENTHRIN TECHNICAL Product Chemistry – Group B: Open Literature Citation and Request for Waiver for Certain Physical / Chemical Properties Data; 830.6314, 830.6315, 830.6316, 830.6319, 830.6321, 830.7100, 830.7200, 830.7220, 830.7520, 830.7550, 830.7560, 830.7570, 830.7840, 830.7860, 830.7950

Company Official:

Rachel L Hardie — Authorized Agent

Rachel L Hardie — Signature

Company Name: RedEagle International LLC

Company Contact:

Rachel L Hardie — Authorized Agent

(302) 635-7289 — Phone

Submitted Electronically via CDX portal

November 27, 2018

WRA
Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

Document Processing Desk (REGFEE)
Attn: Mindy Ondish, PM 3
Registration Division
U.S. Environmental Protection Agency
Office of Pesticide Programs (7505P)
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501

Dear Ms. Ondish:

Subject: Application to register a new technical grade active ingredient (PRIA R334)
Bifenthrin Technical

Wagner Regulatory Associates, Inc., as agent for RedEagle International LLC (EPA Co. 85678), is requesting registration of the above referenced product containing the currently registered active ingredient Bifenthrin (PC code 128825).

In support of this request, the following documents and studies are attached:

- Letter from RedEagle International LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- Confidential Statement of Formula (8570-4)
- Certification with Respect to Citation of Data (8570-34)
- Data Matrix (8570-35), internal and public copies
- Data Transmittal Document
- Data as outlined in the transmittal document
- Draft label Certification with Respect to Label Integrity
- A copy of the receipt confirming payment of the required registration fees for PRIA R334.

Thank you in advance for your review of this submission. If you have any questions about this submission, please contact the undersigned at 302-635-7289 or at email address rachel@wagnerreg.com.

Respectfully submitted,

Rachel L Hardie
Agent for RedEagle International LLC

Enclosures

21-Day Screen Completed by Contractor

21-Day Expires on 12/18/18

Jacket # 85678-AL

MRID# 506684

Content Screen: Recommend to Pass/Fail

11-3 Review: Pass/Fail/NA

Overall Status: Recommend to Pass/Fail

Transfer This Jacket to:

Donna Davis

03

03

PRIA 3 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

September 2012

21 Day Screen Start Date: 11/27/18

Experts In-Processing Signature: _____ Date 11/30/18 Fee Paid: Yes ✓

Division management contacted on issues No_____ Yes _____ Date _____

EPA Reg. Number: 85678-AL	EPA Receipt Date: 11/27/18

	Items for Review			Yes	No	N/A*
1	**Application Form** (EPA Form 8570-1) signed & complete including package type			X		
2	**Confidential Statement of Formula** all boxes completed, form signed, and dated (EPA Form 8570-4)			X		
	a) All inerts, including fragrances, approved for the proposed uses (see Footnote A) N/A, No Inerts to Review Technical, Impurities, + Water Only	**yes**	**no**			
3	**Certification with Respect to Citation of Data** (EPA Form 8570-34) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	**yes**	**no**			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	**Formulator's Exemption Statement** (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)					X
5	**Data Matrix** (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)			X		
		yes	**no**			
	a) Selective Method (Fee category experts use)	X				
	b) Cite-All (Fee category experts use)					
	c) Applicant owns all data (Fee category experts use)					
6	**5 Copies of Label (Electronic labels on CD are encouraged and guidance is available)**			X		
7	**Is the data package consistent with PR Notice 86-5**			X		
8	**Notice of Filing included with petitions**					X

9	**If applicable for conventional applications, <u>reduced risk rationale</u>**			
10	**<u>Required Data</u> and/or data waivers. See Footnote C.**			
	a) List study (or studies) not included with application			

Comments:

Documentation: Pass
Required forms are complete
Inerts: N/A
Technical, Impurities, & Water Only
No Inerts to Review
PRN 11-3: Pass
MRID: 506684
Overall Status: Pass

GS 12/3/18

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses or have an application pending with the Agency. If an unapproved inert with no application pending with the Agency is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses or have an application pending with the Agency **even if a product is currently registered** by consulting the inert Web site and if the inert is not approved nor has an application pending with the Agency, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient.** Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch.

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or

2. Provide the required information necessary to identify an inert approval application that is pending with the Agency; or

3. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;

4. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R300 or R301), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or

2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or

2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

November 29, 2018

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OPP Decision Number: D-546545
EPA File Symbol or Registration Number: 85678-AL
Product Name: Bifenthrin Technical
EPA Receipt Date: 27-Nov-2018
EPA Company Number: 85678
Company Name: REDEAGLE INTERNATIONAL LLC

MS. RACHEL L HARDIE
WAGNER REGULATORY ASSOCIATES, INC.
REDEAGLE INTERNATIONAL LLC
PO Box 640
HOCKESSIN, DE 19707-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R334

NEW PRODUCT;MUP OR END USE PRODUCT WITH UNREGISTERED SOURCE OF THE ACTIVE INGREDIENT;REQUIRES SCIENCE DATA REVIEW;NEW PHYSICAL FORM;SELECTIVE DATA CITATION;

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 347-0510.

Sincerely,

Front End Processing Staff
Information Technology & Resources Management Division

T9

Fee for Service {1028200u~

This package includes the following

- ◉ New Registration
- ○ Amendment

for Division

- ○ AD
- ○ BPPD
- ◉ RD

☑ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ___

Risk Mgr. 3

Receipt No. S- 1028200

EPA File Symbol/Reg. No. 85678-AL

Pin-Punch Date: 11/27/2018

This item is NOT subject to FFS action.

Action Code:

Requested: R334

Granted: R334

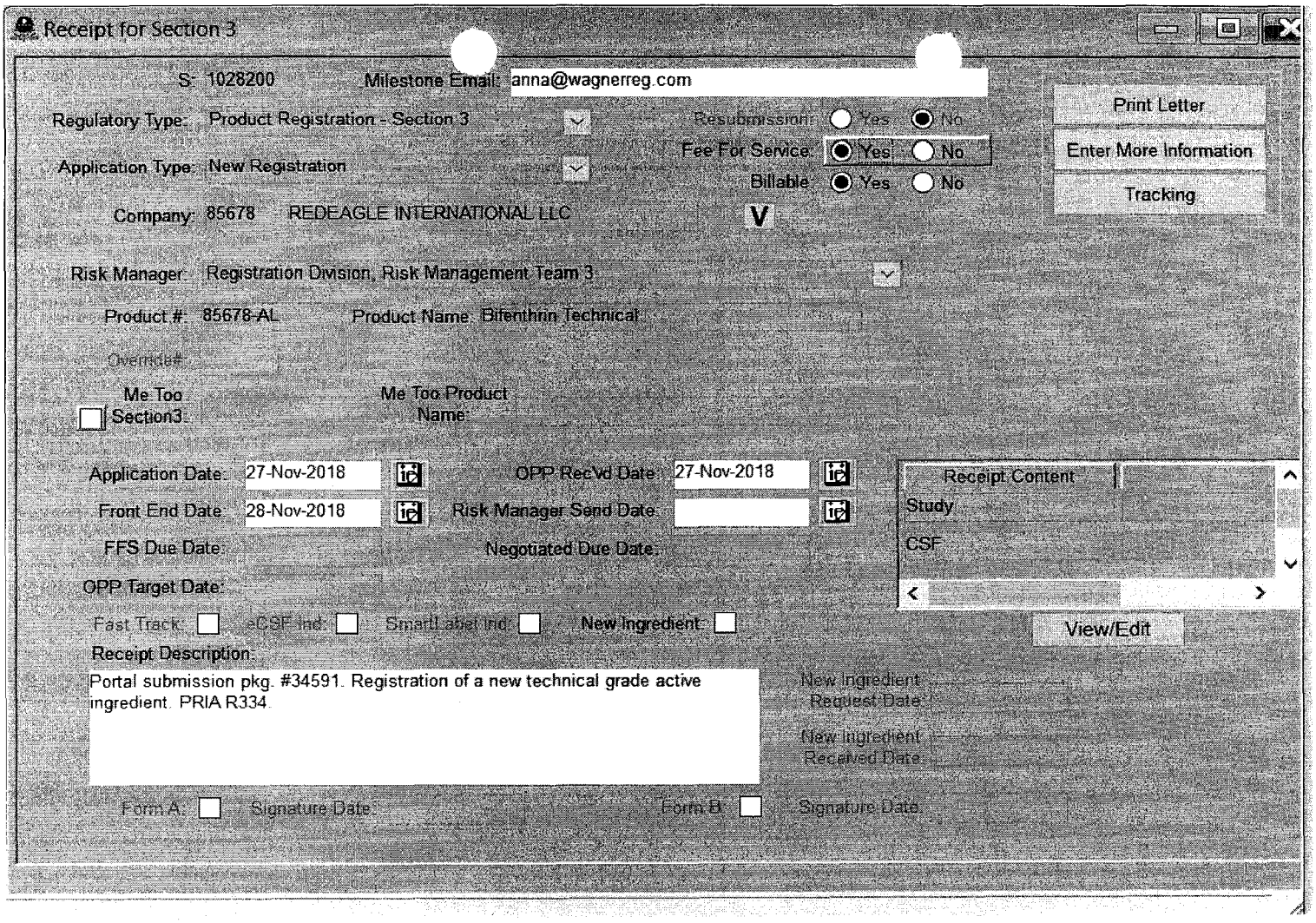
Amount Due: $ 19,838

Parent/Child Decisions:

☒ Inert Cleared for Intended Use ☒ Uncleared Inert in Product

Reviewer: Maryam K. M Date: 11/29/18

Remarks:


Receipt for Section 3
S: 1028200
Milestone Email: anna@wagnerreg.com
Regulatory Type: Product Registration - Section 3
Resubmission: Yes No
Fee For Service: Yes No
Application Type: New Registration
Billable: Yes No
Print Letter
Enter More Information
Tracking
Company: 85678 REDEAGLE INTERNATIONAL LLC
Risk Manager: Registration Division, Risk Management Team 3
Product #: 85678-AL
Product Name: Bifenthrin Technical
Override#:
Me Too Section3:
Me Too Product Name:
Application Date: 27-Nov-2018
OPP Recvd Date: 27-Nov-2018
Front End Date: 28-Nov-2018
Risk Manager Send Date:
FFS Due Date:
Negotiated Due Date:
OPP Target Date:
Receipt Content
Study
CSF
Fast Track:
eCSF Ind:
SmartLabel Ind:
New Ingredient:
View/Edit
Receipt Description:
Portal submission pkg. #34591. Registration of a new technical grade active ingredient. PRIA R334.
New Ingredient Request Date:
New Ingredient Received Date:
Form A:
Signature Date:
Form B:
Signature Date:

From: notification@pay.gov
To: Anna Armstrong
Subject: Pay.gov Payment Confirmation: PRIA Service Fees
Date: Wednesday, November 14, 2018 2:12:31 PM

An official email of the United States government

Paygov logo

Your payment has been submitted to Pay.gov and the details are below. If you have any questions regarding this payment, please contact Michael Yanchulis at (703) 347-0237 or yanchulis.michael@epa.gov.

Application Name: PRIA Service Fees
Pay.gov Tracking ID: 26DGGFQG
Agency Tracking ID: 75615454250
Transaction Type: Sale
Transaction Date: 11/14/2018 02:12:21 PM EST
Account Holder Name: Cheryl R. Wagner
Transaction Amount: $19,838.00
Card Type: AmericanExpress
Card Number: **********2008

Registration Number:
Company Name: RedEagle International LL
Company Number: 85678
Action Code: R334

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.

Pay.gov is a program of the U.S. Department of the Treasury, Bureau of the Fiscal Service

Submitted Electronically via CDX portal

November 27, 2018

WRA
Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

Document Processing Desk (REGFEE)
Attn: Mindy Ondish, PM 3
Registration Division
U.S. Environmental Protection Agency
Office of Pesticide Programs (7505P)
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501

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Bifenthrin Technical

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- Data as outlined in the transmittal document
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Thank you in advance for your review of this submission. If you have any questions about this submission, please contact the undersigned at 302-635-7289 or at email address rachel@wagnerreg.com.

Respectfully submitted,

Rachel L Hardie

Rachel L Hardie
Agent for RedEagle International LLC

Enclosures

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RedEagle International LLC (EPA Company Number 85678)
c/o Wagner Regulatory Associates
PO Box 640
Hockessin, DE 19707

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Bifenthrin Technical

3. **Transmittal Date**
November 27, 2018

4. **List of Submitted Studies**

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Company Official:

Rachel L Hardie — Authorized Agent

Rachel L Hardie — Signature

Company Name: RedEagle International LLC

Company Contact:

Rachel L Hardie — Authorized Agent

(302) 635-7289 — Phone

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number RedEagle International LLC, P.O. Box 640, Hockessin, DE 19707	EPA Registration Number/File Symbol 85678-XX
Active Ingredient(s) and/or representative test compound(s) Bifenthrin	Date November 27, 2018
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Food and Non-Food Crop	Product Name Bifenthrin Technical

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	☑ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☑ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses .

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature	Date	Typed or Printed Name and Title
Rachel L Hardie	Nov. 27, 2018	Rachel L Hardie, Agent

EPA Form 8570-34 (12-2003) Electronic and Paper versions available. Submit only Paper version.

Please read instructions on reverse before compl form. Form Approved. No. 2070-0060. Approval expires 05-31-98

EPA United States Environmental Protection Agency Washington, DC 20460	✓	Registration	OPP Identifier Number
		Amendment	
		Other	

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
85678 / 85678-XX	Mindy Ondish	☑ None ☐ Restricted
4. Company/Product (Name)	PM#	
RedEagle International LLC / Bifenthrin Technical	3	

5. Name and Address of Applicant *(Include Zip Code)*

RedEagle International LLC
c/o Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707

☐ *Check if this is a new address*

6. **Expedited Review.** In accordance with FIFRA Section 3(c)(3)(b)(I), my product is similar or identical in composition and labeling to:

EPA Reg. No.: 91640-8

Product Name: Bifenthrin Technical

Section - II

☐ Amendment - Explain below.
☐ Resubmission in response to Agency letter dated _____
☐ Notification - Explain below.
☐ Final printed labels in response to Agency letter dated _____
☑ "Me Too" Application.
☐ Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

PRIA Code - R334

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging		Water Soluble Packaging		2. Type of Container
☐ Yes* ☑ No	☐ Yes ☑ No		☐ Yes ☑ No		☐ Metal ☑ Plastic ☐ Glass ☐ Paper ☑ Other (Specify) Lined Fiber Drum
***Certification must be submitted**	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
☑ Label ☐ Container	Bulk	☑ On Label ☐ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product
☐ Lithograph ☐ Other _____
☑ Paper glued
☐ Stenciled

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Rachel L Hardie	Agent for RedEagle International LLC	(302) 635-7289 (rachel@wagnerreg.com)

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received **(Stamped)**

2. Signature	3. Title
Rachel L Hardie	Agent for RedEagle International LLC
4. Typed Name	5. Date
Rachel L Hardie	November 27, 2018

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DATA MATRIX

Date: November 27, 2018	**EPA Reg. No./ File Symbol:** 85678-XX	**Page 1 of 14**
Applicant's/Registrant's Name and Address: RedEagle International LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640, 7217 Lancaster Pike, Suite A Hockessin, DE 19707	**Product:** **Bifenthrin Technical**	

Ingredient: Bifenthrin

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC					
830.1550, 830.1600	Product identity, composition/Description of materials Used to Produce the Product	50668401	RedEagle International LLC	Own	
830.1620	Description of Production Process	50668401	RedEagle International LLC	Own	
830.1670	Discussion of Formation of Impurities	50668401	RedEagle International LLC	Own	
830.1700	Preliminary Analysis	50668402	RedEagle International LLC	Own	
830.1750	Certification of Limits	50668401	RedEagle International LLC	Own	
830.1800	Enforcement Analytical Method	50668402	RedEagle International LLC	Own	
830.6302	Color	50668403	RedEagle International LLC	Own	
830.6303	Physical State	50668403	RedEagle International LLC	Own	
830.6304	Odor	50668403	RedEagle International LLC	Own	
830.6313	Stability to Normal & Elevated Temperatures	50668404	RedEagle International LLC	Own	
830.6314	Oxidation/Reduction	50668410	RedEagle International LLC	Own	
830.6315	Flammability	50668410	RedEagle International LLC	Own	
830.6316	Explodability	50668410	RedEagle International LLC	Own	
830.6317	Storage Stability	50668405	RedEagle International LLC	Own	
830.6319	Miscibility	50668410	RedEagle International LLC	Own	
830.6320	Corrosion Characteristics	50668405	RedEagle International LLC	Own	
830.6321	Dielectric Voltage Breakdown	50668410	RedEagle International LLC	Own	
830.7000	pH	50668406	RedEagle International LLC	Own	
830.7050	UV/Visible Absorption	50668408	RedEagle International LLC	Own	
830.7100	Viscosity	50668410	RedEagle International LLC	Own	
830.7200, 830.7220	Melting Point/Boiling Point	50668410	RedEagle International LLC	Own	
830.7300	Relative Density	50668407	RedEagle International LLC	Own	
830.7370	Dissociation Constant	50668409	RedEagle International LLC	Own	
830.7520	Particle Size Distribution	50668410	RedEagle International LLC	Own	

Signature	**Name and Title**	**Date**
Rachel L Hardie	Rachel L Hardie, Agent for RedEagle International LLC	**November 27, 2018**

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Date: November 27, 2018		**EPA Reg. No./ File Symbol:** 85678-XX	**Page 2 of 14**
Applicant's/Registrant's Name and Address:	RedEagle International LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640, 7217 Lancaster Pike, Suite A Hockessin, DE 19707	**Product:** **Bifenthrin Technical**	
Ingredient: Bifenthrin			

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7550, 830.7560, 830.7570	Octanol Water Partition Coefficient	50668410	RedEagle International LLC	Own	
830.7840, 830.7860	Solubility	50668410	RedEagle International LLC	Own	
830.7950	Vapor Pressure	50668410	RedEagle International LLC	Own	
870.1100	Acute Oral Toxicity	00132519	FMC Corporation	OLD	
870.1200	Acute Dermal Toxicity	00132520	FMC Corporation	OLD	
870.1300	Acute Inhalation Toxicity	46008101	FMC Corporation	PAY	
870.2400	Primary Eye Irritation	00132522	FMC Corporation	OLD	
870.2500	Primary Dermal Irritation	00132521	FMC Corporation	OLD	
870.2600	Dermal Sensitization	00132523	FMC Corporation	OLD	
GENERIC DATA					

Signature	**Name and Title**	**Date**
Rachel L Hardie	Rachel L Hardie, Agent for RedEagle International LLC	**November 27, 2018**

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Date: November 27, 2018		**EPA Reg. No./ File Symbol:** 85678-XX	**Page 3 of 14**
Applicant's/Registrant's Name and Address:	RedEagle International LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640, 7217 Lancaster Pike, Suite A Hockessin, DE 19707	**Product:** **Bifenthrin Technical**	

Ingredient: Bifenthrin

835.1230	Adsorption/Desorption	49175401	Bifenthrin Task Force Steering Committee	PAY	
835.1240	Leaching Studies	00163089	FMC Corporation	OLD	
835.1410	Laboratory Volatility	41220601	FMC Corporation	OLD	
835.2120	Hydrolysis	49138403 00132539	Bifenthrin Task Force Steering Committee FMC Corporation	PAY OLD	
835.2210	Direct Photolysis Rate in Water by Sunlight	48882501	FMC Corporation	PAY	
835.2240	Photodegradation in Water	00163085	FMC Corporation	OLD	
835.2410	Photodegradation in Soil	00163085	FMC Corporation	OLD	
835.4100	Aerobic Soil Metabolism	00132540 00141202 00152266 48882502	FMC Corporation	OLD PAY	
835.4200	Anaerobic Soil Metabolism	00163088 48882503	FMC Corporation	OLD PAY	
835.4300	Aerobic Aquatic Metabolism	48882504	FMC Corporation	PAY	
835.4400	Anaerobic Aquatic Metabolism	49364001	Bifenthrin Task Force Steering Committee	PAY	
835.6100	Terrestrial Field Dissipation	00163091 41673101 41673102 42339201 42339203 49168201	FMC Corporation Bifenthrin Task Force Steering Committee	OLD PAY	
850.1010	Aquatic Invertebrate Acute Toxicity Test, Freshwater Daphnids	00132537 49552201	FMC Corporation Pyrethroid Working Group	OLD PAY	
850.1025	Oyster Acute Toxicity Test	40266501 40383501	FMC Corporation	OLD	
850.1035	Mysid Acute Toxicity Test	00163102 49060102	FMC Corporation Bifenthrin Task Force Steering Committee	OLD PAY	

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Applicant's/Registrant's Name and Address:	RedEagle International LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640, 7217 Lancaster Pike, Suite A Hockessin, DE 19707	**Product:** **Bifenthrin Technical**	
Ingredient: Bifenthrin			

850.1075	Freshwater and Saltwater Fish Acute Toxicity Test	00132536 00163101 00163156	FMC Corporation	OLD	
850.1300	Daphnid Chronic Toxicity Test	40275401 41156501	FMC Corporation	OLD	
850.1350	Saltwater Invertebrate Life Cyle	49412102	Bifenthrin Task Force Steering Committee	PAY	
850.1400	Fish Early Life Stage Toxicity Test	40569402	FMC Corporation	OLD	
850.1500	Fish Life Cycle	49412101	Bifenthrin Task Force Steering Committee	PAY	
850.1730	Fish Bioconcentration Factor	00163094 00163095	FMC Corporation	OLD	
850.1735	Spiked Whole Sediment 10-day Toxicity Test, Freshwater Invertebrates	49277502 49277501	Bifenthrin Task Force Steering Committee	PAY	
850.1740	Spiked Whole Sediment 10-day Toxicity Test, Saltwater Invertebrates	49692801	Bifenthrin Task Force Steering Committee	PAY	
850.1950	Field Testing for Aquatic Organisms	42529902	FMC Corporation	OLD	
850.2100	Avian Acute Oral Toxicity Test	00132532 00132534 49163801	FMC Corporation Bifenthrin Task Force Steering Committee	OLD PAY	
850.2200	Avian Dietary Toxicity Test	00132533 00132535	FMC Corporation	OLD	
850.2300	Avian Reproduction Test	00163097 00163098 00163099 00163100	FMC Corporation	OLD	
850.4100	Seedling Emergence and Seedling Growth	49138401	Bifenthrin Task Force Steering Committee	PAY	
850.4150	Vegetative Vigor	49138402	Bifenthrin Task Force Steering Committee	PAY	
850.4400	Aquatic Plant Toxicity Test, *Lemna spp.*	49134901	Bifenthrin Task Force Steering Committee	PAY	
850.4450	Aquatic Plants Field Study	49060101	Bifenthrin Task Force Steering Committee	PAY	

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Applicant's/Registrant's Name and Address:	RedEagle International LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640, 7217 Lancaster Pike, Suite A Hockessin, DE 19707	**Product:** **Bifenthrin Technical**	

Ingredient: Bifenthrin

850.4500	Algal Toxicity	49116101 49098202	Bifenthrin Task Force Steering Committee	PAY	
850.5400	Aquatic Plant Growth	49098201	Bifenthrin Task Force Steering Committee	PAY	
850.6100	Independent Laboratory Validation	49024201 49189001	Bifenthrin Task Force Steering Committee	PAY	
870.3100	90-Day Oral Toxicity in Rodents	00141199	FMC Corporation	OLD	
870.3150	90-Day Oral Toxicity in Nonrodents	00141200	FMC Corporation	OLD	
870.3200	21/28-Day Dermal Toxicity	00141198 45280501	FMC Corporation	OLD	
870.3700	Prenatal Developmental Toxicity Study	00141201 00145997 45352301	FMC Corporation	OLD	
870.3800	Reproduction and Fertility Effects	00157225	FMC Corporation	OLD	
870.4100	Chronic Toxicity	00163065	FMC Corporation	OLD	
870.4200	Carcinogenicity	00157227	FMC Corporation	OLD	
870.4300	Combined ChronicToxicity/Carcinogenicity	00157226	FMC Corporation	OLD	
870.5100	Bacterial Reverse Mutation Test	00132524	FMC Corporation	OLD	
870.5275	Sex-linked Recessive Lethal Test in Drosophila melanogaster	00145286	FMC Corporation	OLD	
870.5300	In vitro Mammalian Cell Gene Mutation Test	40630001	FMC Corporation	OLD	
870.5375	In vitro mammalian Chromosome Aberration Test	00141195	FMC Corporation	OLD	
870.5380	Mammalian Spermatogonial Chromosonal Aberration Test	00138111	FMC Corporation	OLD	
870.5500	Unscheduled DNA Synthesis in Mammalian Cells in Culture	00138109	FMC Corporation	OLD	
870.6200	Neurotoxicity Screening Battery	44862102 44862103	FMC Corporation	OLD	
870.6300	Developmental Neurotoxicity Study	46750501	FMC Corporation	PAY	

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Applicant's/Registrant's Name and Address:	RedEagle International LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640, 7217 Lancaster Pike, Suite A Hockessin, DE 19707	**Product:** **Bifenthrin Technical**	

Ingredient: Bifenthrin

870.7485	Metabolism and Pharmokinetics	00163066 00163067 00163068 00163069 00163070 00163071 40415101 40415102	FMC Corporation	OLD	
870.7600	Dermal Penetration	00163072 41284202 41917502 41917503	FMC Corporation	OLD	
870.7800	Immunotoxicity	49108801	Bifenthrin Task Force Steering Committee	PAY	
870.8340	Oral and Inhalation Pharmokinetics	49153402	FMC Corporation	PAY	
875.2100	Foliar Dislodgeable Residue Dissipation	41917504 41917505 42142201 44684401 44955201 50544404	FMC Corporation	OLD PAY	
890.1100	Amphibian Metamorphosis (Frog)	48675901	Bifenthrin Task Force Steering Committee	PAY	
890.1150	Androgen Receptor Binding (Rat Prostate Cytosol)	48615001	Bifenthrin Task Force Steering Committee	PAY	
890.1200	Aromatase (Human Recombinant)	48615002	Bifenthrin Task Force Steering Committee	PAY	
890.1250	Estrogen Receptor Binding (Rat Uterine Cytosol)	48615003	Bifenthrin Task Force Steering Committee	PAY	
890.1300	Estrogen Receptor Transcriptional Activation (Human Cell Line (HeLa-9903))	48615004	Bifenthrin Task Force Steering Committee	PAY	
890.1350	Fish Short-term Reproduction	48675902	Bifenthrin Task Force Steering Committee	PAY	
890.1400	Hershberger (Rat)	48615005	Bifenthrin Task Force Steering Committee	PAY	
890.1450	Female Pubertal (Rat)	48669401	Bifenthrin Task Force Steering Committee	PAY	
890.1500	Male Pubertal (Rat)	48669401	Bifenthrin Task Force Steering Committee	PAY	

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Applicant's/Registrant's Name and Address:	RedEagle International LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640, 7217 Lancaster Pike, Suite A Hockessin, DE 19707	**Product:** **Bifenthrin Technical**	

Ingredient: Bifenthrin

890.1550	Steroidgenesis (Human Cell Line – H295R)	48615006	Bifenthrin Task Force Steering Committee	PAY	
890.1600	Uterotrophic (Rat)	48615007	Bifenthrin Task Force Steering Committee	PAY	
Non-Guideline	Leachability from Treated Wood	47454101 47454102	FMC Corporation	PAY	
Non-Guideline	Honey Bee Acute Toxicity	00163096 00163104	FMC Corporation	OLD	

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Ingredient: Bifenthrin			

860.1300	Nature of Residue – Plants, Livestock	00145881 00150018 00150561 00151439 00151440 00152282 00152834 00163075 00163076 40257901 40257902 40257903 40257904 40257905 40257906 40257907 40384402 40384403 40384404 40384405 40384409 40384410 40384411 40527702 40981811 41492605 41492608 41858105 41858107 41858110	FMC Corporation	OLD	

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Applicant's/Registrant's Name and Address:	RedEagle International LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640, 7217 Lancaster Pike, Suite A Hockessin, DE 19707	**Product:** **Bifenthrin Technical**	

Ingredient: Bifenthrin

		41858113 42339202 42357101 42357104 42357105 42368601 42515601 42733401 42927801 42927802 43641801 43801901 43801902 44165201 44455501 44455502 45350910 45377301 45794201	Interregional Research Project No. 4	PL	
860.1340	Residue Analytical Method	42357103 00163081 41858106 41858109 41894601 42357102 45350911 41858111 41858112	FMC Corporation	OLD	

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Ingredient: Bifenthrin			

860.1480	Meat/Milk/Poultry/Eggs	40257910 40257911 40257912 40384401 40384406 40384407 40384408 40527701 41858102 41858111 41858112	FMC Corporation	OLD	

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Ingredient: Bifenthrin			

860.1500	Crop Field Trials	00150021	FMC Corporation	OLD	
		00162835	FMC Corporation	OLD	
		00162836	FMC Corporation	OLD	
		00163079	FMC Corporation	OLD	
		00163905	FMC Corporation	OLD	
		40257908	FMC Corporation	OLD	
		40257909	FMC Corporation	OLD	
		40981810	FMC Corporation	OLD	
		41492603	FMC Corporation	OLD	
		41492604	FMC Corporation	OLD	
		41492606	FMC Corporation	OLD	
		41492607	FMC Corporation	OLD	
		41658501	Interregional Research Project No. 4	PL	
		41658601	Interregional Research Project No. 4	PL	
		41858103	FMC Corporation	OLD	
		41858104	FMC Corporation	OLD	
		41858108	FMC Corporation	OLD	
		41894602	FMC Corporation	OLD	
		41894603	FMC Corporation	OLD	
		41894604	FMC Corporation	OLD	
		42441301	FMC Corporation	OLD	
		42441302	FMC Corporation	OLD	
		42515602	FMC Corporation	OLD	
		42515603	FMC Corporation	OLD	
		43844101	Interregional Research Project No. 4	PL	
		43844201	Interregional Research Project No. 4	PL	
		44056501	Interregional Research Project No. 4	PL	
		44056502	Interregional Research Project No. 4	PL	
		44056503	Interregional Research Project No. 4	PL	
		44581101	Interregional Research Project No. 4	PL	

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Ingredient: Bifenthrin

		44581102	Interregional Research Project No. 4	PL	
		44616901	Interregional Research Project No. 4	PL	
		44620602	FMC Corporation	OLD	
		44746801	Interregional Research Project No. 4	PL	
		44756301	Interregional Research Project No. 4	PL	
		44756302	Interregional Research Project No. 4	PL	
		44756303	Interregional Research Project No. 4	PL	
		44774301	Interregional Research Project No. 4	PL	
		44774302	Interregional Research Project No. 4	PL	
		44805701	FMC Corporation	OLD	
		44859801	Interregional Research Project No. 4	PL	
		44869601	Interregional Research Project No. 4	PL	
		44870501	Interregional Research Project No. 4	PL	
		44870502	Interregional Research Project No. 4	PL	
		44875101	Interregional Research Project No. 4	PL	
		45104101	Interregional Research Project No. 4	PL	
		45104102	Interregional Research Project No. 4	PL	
		45286701	Interregional Research Project No. 4	PL	
		45350902	FMC Corporation	OLD	
		45350903	FMC Corporation	OLD	
		45350904	FMC Corporation	OLD	
		45350905	FMC Corporation	OLD	
		45350906	FMC Corporation	OLD	
		45350907	FMC Corporation	OLD	
		45350908	FMC Corporation	OLD	
		45350909	FMC Corporation	OLD	
		45377302	FMC Corporation	OLD	
		45377303	FMC Corporation	OLD	
		45377304	FMC Corporation	OLD	
		45377305	FMC Corporation	OLD	

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DATA MATRIX

Date: November 27, 2018		**EPA Reg. No./ File Symbol:** 85678-XX	**Page 13 of 14**
Applicant's/Registrant's Name and Address:	RedEagle International LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640, 7217 Lancaster Pike, Suite A Hockessin, DE 19707	**Product:** **Bifenthrin Technical**	

Ingredient: Bifenthrin

		45383101	Interregional Research Project No. 4	PL	
		45383102	Interregional Research Project No. 4	PL	
		45440401	Interregional Research Project No. 4	PL	
		45579801	Interregional Research Project No. 4	PL	
		45579802	Interregional Research Project No. 4	PL	
		45605601	Interregional Research Project No. 4	PL	
		45624701	Interregional Research Project No. 4	PL	
		45660301	Interregional Research Project No. 4	PL	
		45794202	Interregional Research Project No. 4	PL	
		45943401	FMC Corporation	OLD	
		46045001	FMC Corporation	OLD	
		46098701	Interregional Research Project No. 4	PL	
		46279701	Interregional Research Project No. 4	PL	
		46960401	Interregional Research Project No. 4	PL	
		46960402	Interregional Research Project No. 4	PL	
		46960403	Interregional Research Project No. 4	PL	
		46960404	Interregional Research Project No. 4	PL	
		46960801	Interregional Research Project No. 4	PL	
		46961101	Interregional Research Project No. 4	PL	
		46961102	Interregional Research Project No. 4	PL	
		46961103	Interregional Research Project No. 4	PL	
		47144501	Interregional Research Project No. 4	PL	
		47144502	Interregional Research Project No. 4	PL	
		47144503	FMC Corporation	PAY	
		47920801	Interregional Research Project No. 4	PL	
		49167001	Bifenthrin Task Force Steering Committee	PAY	
		49180801	Bifenthrin Task Force Steering Committee	PAY	
		49180802	Bifenthrin Task Force Steering Committee	PAY	
		49241401	Bifenthrin Task Force Steering Committee	PAY	
		49314301	Bifenthrin Task Force Steering Committee	PAY	

Signature	**Name and Title**	**Date**
Rachel L Hardie	Rachel L Hardie, Agent for RedEagle International LLC	**November 27, 2018**

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Applicant's/Registrant's Name and Address:	RedEagle International LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640, 7217 Lancaster Pike, Suite A Hockessin, DE 19707	**Product:** **Bifenthrin Technical**	
Ingredient: Bifenthrin			

		49341301	Bifenthrin Task Force Steering Committee	PAY	
		49821701	Interregional Research Project No. 4	PL	
		49821702	Interregional Research Project No. 4	PL	
		49821703	Interregional Research Project No. 4	PL	
		49821704	Interregional Research Project No. 4	PL	
		49821705	Interregional Research Project No. 4	PL	
		49821706	Interregional Research Project No. 4	PL	
		50635401	FMC Corporation	PAY	
860.1850	Confined Accumulation in Rotation Crops	00163093 42039601	FMC Corporation	OLD	
860.1900	Field Accumulation in Rotational Crops	45306501	FMC Corporation	OLD	
Exposure Data	Exposure Data	Cite All	Spray Drift Task Force, Washington, DC	PAY	
			Ag Handler Exposure Task Force, Macon, MO	PAY	
			Outdoor Residential Exposure Task Force, Washington, DC	PAY	
			Ag Re-Entry Task Force, Washington, DC	PAY	
			Generic Residential Exposure Task Force, Gig Harbor, WA	PAY	

Signature	**Name and Title**	**Date**
Rachel L Hardie	Rachel L Hardie, Agent for RedEagle International LLC	**November 27, 2018**

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